

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1, 2, 4-18 and 20-23 are pending in this application. Claims 1, 17, and 21 are independent. Claims 1, 4, 17 and 21 are hereby amended. No new matter has been introduced. Support for this amendment can be found throughout the Specification as originally filed

Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §102**

Claims 1, 2, 4, 7, 21 and 22 were rejected under 35 U.S.C. §102 as allegedly anticipated by International Publication No. WO 01/22751 (PCT/F100/00808) to Ala-Luukko et al. (hereinafter, merely “Ala-Luukko”).

Applicants respectfully traverse this rejection.

Independent claim 1 recites, *inter alia*:

“A method of controlling delivery of text messages to a subscriber...

...

providing by the signal processing means, in response to the routing query on behalf of an HLR (home location register) of the home network, a modified address which causes the text message from said another network to be directed to said message processing means for implementation of said delivery mode,

...

wherein the modified address is used instead of an address from the HLR. (Emphasis added).

As understood by the Applicants, Ala-Luukko discloses, in relevant part, that if the gateway (GW) determines, by checking the associated database (DB), that a subscriber has activated the forwarding service then GW consults the Home Locator Register (HLR) to determine where the message should be sent. The HLR provides the “forward-to” number instead of the roaming number.

There is no disclosure in Ala-Luukko of “the modified address is used instead of an address from the HLR.” Rather, in Ala-Luukko it is the HLR itself that provides the actual address, whether this is the “forward-to” number or the roaming number. This is then used, without being modified by the GW, to deliver the message.

In contrast, claim 1 recites, “intercepting a routing query from another network . . . by a signal processing means . . . providing . . . in response to the routing query on behalf of an HLR . . . a modified address which causes the text message from said another network to be directed to said message processing means for implementation of said delivery mode [and] . . . the modified address is used instead of an address from the HLR.” That is, in an aspect of the present invention, the signal processing means intercepts a query from another network for routing a text message. In response to the routing query, the signal processor provides a

modified address that is used instead of the address from the HLR. This is distinguished from Ala-Luukko wherein the HLR provides the “forward-to” number instead of the roaming number.

The Office Action contends Ala-Luuko’s “forward-to address” corresponds to the present application’s “modified address.” In Ala-Luuko, the HLR, as opposed to any other equipment, supplies the location address (the “forward-to address”). In contrast, each of the independent claims had been amended to recite, “the modified address is used instead of an address from the HLR.” Thus, in the present application, the modified address doe not come from the HLR as distinguished from Ala-Luuko.

Thus, in an example from the specification, Sending Routing Information (SRI) aliasing may be used to ensure that the text message passes to an equipment in network B. Whenever any other network wishes to send a text message to a recipient who subscribes to network B, a routing query called "Send Routing Information for Short Message (SRI-SM)" will be sent from the originating network's SMSC to the HLR in network B. Network B's signalling architecture can be configured to direct these SRI-SM messages via an SMS Router in Network B. The SMS Router responds on behalf of the HLR, but instead of directing the MT text message to the destination mobile as the HLR would have done, the router directs the MT text message to be routed to an SMS Router in Network B. Publ. App. par. [0045].

Claim 1 is patentable over Ala-Luukko because that reference does not disclose each and every element recited in the claim.

For reasons similar or somewhat similar to those described above with regard to independent claim 1, independent claims 17 and 21 are also believed to be patentable.

### **III. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 17, 18 and 20 were rejected as allegedly obvious over Ala-Luukko;

Claims 5, 8, 9, 11 and 12 were rejected as obvious over Ala-Luukko in view of U.S. Patent No. 6,108,559 to Astrom, et al. (hereinafter, merely “Astrom”);

Claims 6, 9, 12, 13, 16 and 23 were rejected as obvious over Ala-Luukko in view of U.S. Pub. No. 2003/0012348 to Skladman, et al. (hereinafter, merely “Skladman”); and

Claims 10, 14 and 15 were rejected as obvious over Ala-Luukko in view of U.S. Patent No. 6,101,393 to Alperovich et al. (hereinafter, merely “Alperovich”).

Alstrom, Skladman and Alperovich do not add the element missing from Ala-Luukko as discussed above.

### **IV. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### **CONCLUSION**

In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested that the

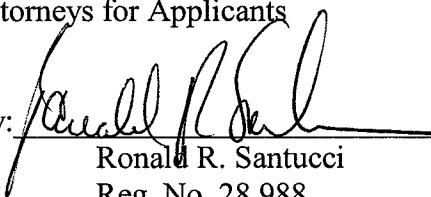
Examiner specifically indicate those portions of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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